

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Beijing Shougang Mining Investment
Company Ltd., China Heilongjiang
International Economic & Technical
Cooperative Corp., and Qinhuangdaoshi
Qinlong International Industrial Co. Ltd.,

plaintiffs,

- against -

Mongolia,

defendant.

Civil Action Number

17 CV 7436

**DECLARATION OF
MICHAEL A. GRANNE**

Michael A. Granne, pursuant to 28 U.S.C. § 1746, declares and states as follows:

1. I am an attorney admitted to practice before this Court and a partner of the law firm, Provenzano Granne & Bader LLP, counsel for Beijing Shougang Mining Investment Company Ltd., China Heilongjiang International Economic & Technical Cooperative Corp., and Qinhuangdaoshi Qinlong International Industrial Co. Ltd. (collectively, the “**Petitioners**”).

2. I submit this declaration on behalf of the Petitioners in support of the Petitioners’ Petition to Vacate Arbitration Award, dated September 28, 2017.

3. Attached as Exhibit A to this declaration is a true and correct copy of *Beijing Shougang Mining Investment Company Ltd., China Heilongjiang International Economic & Technical Cooperative Corp., and Qinhuangdaoshi Qinlong International Industrial Co. Ltd. v. Mongolia, Permanent Court of Arbitration, Award (June 30, 2017)*].

4. Attached as Exhibit B to this declaration is a true and correct copy of *Beijing Shougang Mining Investment Company Ltd., China Heilongjiang International Economic & Technical Cooperative Corp., and Qinhuangdaoshi Qinlong International Industrial Co. Ltd. v. Mongolia, Permanent Court of Arbitration, Request for Arbitration (February 10, 2010)*.

5. Attached as Exhibit C to this declaration is a true and correct copy of *Beijing Shougang Mining Investment Company Ltd., China Heilongjiang International Economic & Technical Cooperative Corp., and Qinhuangdaoshi Qinlong International Industrial Co. Ltd. v. Mongolia, Permanent Court of Arbitration, Permanent Court of Arbitration, Procedural Order No. 1 (November 2, 2010)*.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 28, 2017 in New York, NY.

/s/ Michael A. Granne

Michael A. Granne